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Attorneys for Defendants COUNTY OF YOLO, CITY OF DAVIS, CITY OF WOODLAND,
CITY OF WEST SACRAMENTO, ANGEL BARAJAS, OSCAR VILLEGAS, DONALD
SAYLOR, CHAD RINDE, AARON LAUREL, KEN HIATT, and MICHAEL WEBB

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MICHAEL BISCH, an individual,

Plaintiff,

vs.

COUNTY OF YOLO, et al.,

Defendants.

) Case No.: 2:23-cv-00455-MCE-DB

) **STIPULATION AND [proposed] ORDER**
) **TO EXTEND TIME TO RESPOND TO**
) **COMPLAINT**

Plaintiff MICHAEL BISCH (“Plaintiff”) and Defendants County of Yolo, City of Davis,
City of Woodland, City of West Sacramento, Angel Barajas, Oscar Villegas, Donald Saylor, Chad
Rinde, Aaron Laurel, Ken Hiatt, and Michael Webb (“Defendants”) (collectively, “Parties”), by
and through their respective counsel, hereby stipulate as follows:

WHEREAS, Defendants previously filed a Motion to Dismiss and an Anti-SLAPP Motion
in this matter that were denied without prejudice as a result of a stay that has since been lifted
(ECF Nos. 22, 33);

WHEREAS, Plaintiff has agreed to produce to Defendants potentially relevant evidence
from the related state court matter that may impact the scope of Defendants’ motions and has been
doing so;

1 WHEREAS, the Parties agreed that additional time was necessary for Plaintiff to produce
2 this evidence and for Defendants to review the materials before re-filing the Motion to Dismiss
3 and Anti-SLAPP Motion;

4 WHEREAS, the Parties previously stipulated and agreed that Defendants' deadline to re-
5 file the Motion to Dismiss and Anti-SLAPP Motion would be extended to September 26, 2024;

6 WHEREAS, since the Parties' previous stipulation, the Parties conferred further and
7 determined additional time is necessary because Plaintiff is offering to provide detailed written
8 analysis on the new deposition evidence and related exhibits, which Defendants had not seen and
9 Plaintiff anticipates getting that analysis to Defendants by Friday September 20, 2024;

10 WHEREAS, since the Parties previous stipulation, Plaintiff's deposition in the related state
11 court matter was scheduled for September 23, 2024, which Defendants' counsel in this matter will
12 attend, and this deposition is also potentially relevant to the decision of whether to refile similar
13 motions or otherwise answer or respond.

14 NOW, THEREFORE, the Parties stipulate and agree that Defendants' deadline to re-file
15 the Motion to Dismiss and Anti-SLAPP Motion shall be extended to October 4, 2024.

16
17 IT IS SO STIPULATED.

18
19 Dated: September 19, 2024

ANGELO, KILDAY & KILDUFF, LLP

20 /s/ *Serena M. Warner*

21 By: _____
22 SERENA M. WARNER
23 JACOB J. GRAHAM
24 Attorneys for Defendants COUNTY OF
25 YOLO, CITY OF DAVIS, CITY OF
26 WOODLAND, CITY OF WEST
27 SACRAMENTO, ANGEL BARAJAS,
28 OSCAR VILLEGAS, DONALD
SAYLOR, CHAD RINDE, AARON
LAUREL, KEN HIATT, and MICHAEL
WEBB

1 Dated: September 19, 2024

SANJIV N. SINGH, A PROFESSIONAL
LAW CORPORATION

2
3 /s/ *Sanjiv N. Singh*
(as authorized on 9.19.24)

4 By: _____
5 SANJIV N. SINGH
6 Attorneys for Plaintiff MICHAEL BISCH

7 Dated: September 19, 2024

INDRAJANA LAW GROUP, A
PROFESSIONAL CORPORATION

8 /s/ *Michael B. Indrajana*
9 (as authorized on 9.19.24)

10 By: _____
11 MICHAEL B. INDRAJANA
12 Attorneys for Plaintiff MICHAEL BISCH
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ORDER

IT IS HEREBY ORDERED Defendants' deadline to re-file the Motion to Dismiss and Anti-SLAPP Motion shall be extended to October 4, 2024.

Dated: September 19, 2024

MORRISON C. ENGLAND JR.
SENIOR UNITED STATES DISTRICT JUDGE